

Exhibit C

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA,
ex rel. ALEX DOE, Relator,

THE STATE OF TEXAS,
ex rel. ALEX DOE, Relator,

THE STATE OF LOUISIANA,
ex rel. ALEX DOE, Relator,

Plaintiffs,

v.

PLANNED PARENTHOOD
FEDERATION OF AMERICA, INC.,
PLANNED PARENTHOOD GULF
COAST, INC., PLANNED
PARENTHOOD OF GREATER
TEXAS, INC., PLANNED
PARENTHOOD SOUTH
TEXAS, INC., PLANNED
PARENTHOOD CAMERON
COUNTY, INC., PLANNED
PARENTHOOD SAN ANTONIO,
INC.,

Defendants.

Civil Action No. 2:21-CV-00022-Z

**DECLARATION OF ANDREW STEPHENS IN SUPPORT OF RELATOR'S
OPPOSITION TO PPFA'S EMERGENCY MOTION FOR PROTECTIVE
ORDER, EXPEDITED BRIEFING, AND STAY OF DEADLINE TO MOVE TO
PRESERVE CONFIDENTIALITY**

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury as follows:

1. I am over the age of eighteen and am competent to make this declaration.

2. In our review of documents produced Defendant Planned Parenthood Federation of America we identified a number of documents designated Attorney Eyes Only that are from news sources and other generic media sources and do not contain any information covered by the Protective Order. Using search terms from these documents, I ran a number of searches of documents designated Attorney Eyes Only to identify other similar documents.

3. The search terms I used and the number of Attorney Eyes Only documents for each search term are as follows:

- “Bloomberg” (947)
- “buzzfeed” (636)
- “news digest” (227)
- “natlmediadept” (1,826)
- “bna.com” (42)
- “fiercehealthpayer” (26)
- “hhs.gov” (350)
- “media.office” (1,992)

I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct. Executed on September 29, 2022.

/s/ Andrew Stephens
Andrew Stephens